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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MYRA MELISSA ZYCH,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-02038-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion to Remand (Dkt. No. 14, filed on June 6, 2023), currently due on July 6, 2023, by 32 days, through and including August 7, 2023. Defendant further requests that all subsequent deadlines be extended accordingly. This is Defendant's first request for an extension of time to file a response.

Good cause exists for this extension. Defendant respectfully requests this additional time because Defendant's counsel is experiencing an extremely heavy workload, despite due diligence. In addition to this case, the undersigned is preparing the Commissioner's response briefs for multiple district court cases with concurrent deadlines. The undersigned currently has six district court briefs

1 due within one week surrounding the current due date of the response brief in this case. For this
2 reason, Defendant's counsel requires additional time to properly address the issues raised in Plaintiff's
3 Motion to Remand. This request is made in good faith and with no intention to unduly delay the
4 proceedings.

5 Counsel for Defendant advised counsel for Plaintiff of the need for this extension on June 29,
6 2023. Counsel for Plaintiff confirmed that Plaintiff does not object to this request.

7 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
8 Motion to Remand, through and including August 7, 2023.

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10 Dated: June 29, 2023

Respectfully submitted,

11 JASON M. FRIERSON
12 United States Attorney

13 /s/ David Priddy
14 DAVID PRIDDY
15 Special Assistant United States Attorney

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17 IT IS SO ORDERED:

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: 6/30/2023
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorney for Plaintiff

Dated: June 29, 2023

/s/ David Priddy
DAVID PRIDDY
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